

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

-versus-

Civil Action No.: 18-CV-6369

UBS SECURITIES LLC, UBS AG,
MORTGAGE ASSET SECURITIZATION
TRANSACTIONS, INC., and UBS REAL
ESTATE SECURITIES, INC.,

Defendants.

Stipulation and Order Concerning Production of Certain Investigative Transcripts

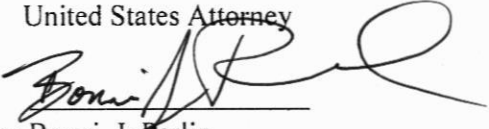
The United States of America and UBS Securities LLC, UBS AG, Mortgage Asset Securitization Transactions, Inc., and UBS Real Estate Securities, Inc. (collectively, "UBS"), through their respective undersigned counsel ("Parties"), hereby stipulate as to the following:

1. The production by the United States or any other entity, of any transcript of any deposition or interview conducted by the New York State Office of the Attorney General (individually, a "Deposition Transcript") shall not be construed as a waiver of any privilege or evidentiary immunity, including but not limited to the common interest privilege and the law enforcement or investigatory files privilege, nor shall it provide a basis for UBS to seek the production of any other document or transcript covered by any privilege or evidentiary immunity. Nothing herein prevents UBS from contesting any claim that any Deposition Transcript was not privileged prior to its production or from asserting that any privilege applicable to a Deposition Transcript was waived for reasons other than its production.
2. UBS and its counsel will retain possession of any produced Deposition Transcript for the pendency of the litigation, and shall use the Deposition Transcripts only for the purposes of this litigation and for no other purpose. UBS and its counsel will not provide copies or access to any Deposition Transcript to any person who is not a party to this litigation; provided however, UBS and its counsel shall be permitted to disclose any Deposition Transcript to (a) the Court and its personnel; (b) any deponent or potential witness in this matter; (c) any persons, firms, vendors, or experts retained by UBS or its counsel; or (d)

any other person agreed to by the parties or as ordered by the Court. Should counsel for UBS receive a subpoena or any request to produce any Deposition Transcript, counsel for UBS will immediately notify undersigned counsel for the United States of said subpoena or request, and will permit the United States to interpose any objections to said subpoena or request.


3. UBS and its counsel will return to the United States, or destroy, any and all copies of any Deposition Transcript in their possession upon the conclusion of this litigation.
4. Nothing herein shall be construed to otherwise limit or waive any applicable defense to the claims asserted against UBS in the Complaint.

Richard P. Donoghue
United States Attorney


By: Bonni J. Ferlin

271 Cadman Plaza East
Brooklyn, NY 11201
(718) 254-7000
Assistant United States Attorney

Justin J. DeCamp
Sullivan & Cromwell LLP


By: Justin J. DeCamp

125 Broad Street
New York, NY 10004
Counsel for and UBS Securities
LLC, UBS AG, Mortgage Asset
Securitization Transactions, Inc.,
and UBS Real Estate Securities,
Inc.
(212) 558-4000

SO ORDERED.


Honorable Peggy Kuo
United States Magistrate Judge

Brooklyn, New York, this 6th day of June, 2019